

1 BARTLETT, LEADER-PICONE & YOUNG, LLP
 2 MALCOLM LEADER-PICONE (State Bar No. 104620)
 2201 BROADWAY, SUITE 803
 3 OAKLAND, CA 94612
 4 TELEPHONE: 510-444-2404
 5 FACSIMILE: 510-444-1291
 6 EMAIL: MLP@LEADER-PICONE.COM

FILED

2007 JUN 25 PM 2:33

E-filing

RECEIVED
CLERK OF COURT
JULY 1, 2007
OAKLAND, CALIFORNIA

7 MONTGOMERY, MCCracken, WALKER & RHOADS, L.L.P.
 8 JEANNE L. BAKKER, ESQ.
 9 AVENUE OF THE ARTS
 10 123 S. BROAD STREET
 11 PHILADELPHIA, PA 19109
 12 TELEPHONE: 215-772-7521
 13 FACSIMILE: 215-772-7620
 14 EMAIL: JBAKKER@MMWR.COM

15 Local and *Pro Hac Vice* Attorneys for Defendants
 16 CELANESE AMERICAS RETIREMENT
 17 PLANS SERVICE CENTER; et al.

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 OAKLAND DIVISION

21 ROBERT SQUIRES, SR.

22 Plaintiff,

23 vs.

24 CELANESE AMERICAS RETIREMENT
 25 PLANS SERVICE CENTER, CELANESE
 26 AMERICAS CORPORATION, and
 27 CELANESE AMERICAS CORPORATION
 RETIREMENT PENSION PLAN,

Defendants.

) No. 007-03325

) Upon Removal of Case from the Alameda

) Superior Court, Case No. VS07325247

) APPLICATION OF JEANNE L.

) BAKKER, ESQ. OF THE LAW FIRM

) OF MONTGOMERY, MCCracken,

) WALKER & RHOADS, L.L.P. TO

) REPRESENT DEFENDANTS *PRO HAC*

) *VICE*.

BY FAX

TO THE ABOVE-ENTITLED COURT AND TO PLAINTIFF:

PLEASE TAKE NOTICE that, pursuant to Civil Local Rule 11-3 of the United States District Court for the Northern District of California, attorney JEANNE L. BAKKER, Esq. of the law firm of MONTGOMERY, MCCracken, WALKER & RHOADS, L.L.P. request leave of

1 Court to represent the defendants, Celanese Americas Retirement Plans Service Center ("Service
2 Center"), Celanese Americas Corporation ("Celanese"), and the Celanese Americas Corporation
3 Retirement Pension Plan ("Plan") (collectively "defendants"), *pro hac vice* in this action.

4 In accordance with Civil L.R. 11-3, JEANNE L. BAKKER, ESQ. of the law firm of
5 MONTGOMERY, MCCracken, WALKER & RHOADS, L.L.P. in Philadelphia, Pennsylvania, avers
6 as follows:

7 1. She is an active member in good standing of the bar of a United States
8 Court and of the highest court of the State of Pennsylvania;

9 2. She agrees to abide by the Standards of Professional Conduct set forth
10 in Civil L.R. 11-4, and to become familiar with the Local Rules and Alternative Dispute
11 Resolution Programs of this Court; and,

12 3. Malcolm Leader-Picone, who is a member of the bar of this Court in
13 good standing and who maintains an office within the State of California, is designated as
14 co-counsel.

15 WHEREFORE, Jeanne L. Bakker, Esq. makes the foregoing representations under
16 penalty of perjury under the laws of the United States of America, and she requests leave of the Court to
17 appear as counsel for defendants *pro hac vice*.

18 DATED: June 19, 2007.

Jeanne L. Bakker
JEANNE L. BAKKER, Esq.

19
20 ^{m-p}
21 DATED: June 20, 2007.

BARTLETT, LEADER-PICONE & YOUNG, LLP

22 BY: [Signature]

23 MALCOLM LEADER-PICONE (No. 104620)
24 Attorneys for Defendants
25 CELANESE AMERICAS RETIREMENT PLANS
26 SERVICE CENTER, CELANESE AMERICAS
27 CORPORATION, and CELANESE AMERICAS
CORPORATION RETIREMENT PENSION PLAN

PROOF OF SERVICE BY MAIL

I, Malcolm Leader-Picone, declare that:

I am employed in the County of Alameda, California. I am over the age of eighteen years and not a party to the within action. My business address is 2201 Broadway, Suite 803, Oakland, CA 94612. On June ~~20~~²¹, 2007, I served the following document(s) entitled:

APPLICATION OF JEANNE L. BAKKER, ESQ. OF THE LAW FIRM OF MONTGOMERY, MCCracken, WALKER & RHOADS, L.L.P. TO REPRESENT DEFENDANTS *PRO HAC VICE*.

upon the following person(s) in said action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at Oakland, California addressed as follows:

Robert Squires, Sr.
3111 Paseo Granada
Pleasanton, CA 94566

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Oakland, California, on June ~~20~~²¹, 2007.


Malcolm Leader-Picone